

Message

From: Clark, Emily [eclark@eastman.com]
Sent: 2/5/2021 4:39:23 PM
To: Bauer, Jeff [Bauer.Jeff@epa.gov]; Cox, Jim [ajcox@eastman.com]
CC: Hott, John L [johnhott@eastman.com]; Boito, Scott C [sboito@eastman.com]; Clark, Emily [eclark@eastman.com]
Subject: RE: [EXTERNAL] RE: P-20-0182

Hi Jeff,

Two more weeks have gone by now waiting on a response from you and the results of the Human Health report for DBST. This PMN was submitted on September 15th of 2020. How can we gain some certainty on when we might receive this report, which will allow Eastman to move this PMN forward.

Additionally, we have not spoken relative to an extension of the PMN, based on Day 90 being on 1/12/21.

Can you please speak to the team regarding when we might be able to review the HH assessment and we should also speak regarding an extension and communications regarding that. We would appreciate understanding the roadblocks to this information.

Best regards,

Emily Clark
Product Stewardship and Regulatory Affairs
International Chemical Control Law Regional Team Lead
Regulatory Intelligence & Advocacy Team Lead
Eastman Chemical Company
1.423.229.8716 Office
1.219.671.4753 Mobile

From: Clark, Emily <eclark@eastman.com>
Sent: Monday, January 25, 2021 10:44 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>; Cox, Jim <ajcox@eastman.com>
Cc: Clark, Emily <eclark@eastman.com>
Subject: RE: [EXTERNAL] RE: P-20-0182

Hi Jeff,

I am checking in on the progress and availability of the HH assessment for this PMN and when Eastman can expect to receive that from our September 15th submission?

Best regards,

Emily Clark
Product Stewardship and Regulatory Affairs
International Chemical Control Law Regional Team Lead
Regulatory Intelligence & Advocacy Team Lead
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From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Tuesday, January 5, 2021 3:27 PM

To: Cox, Jim <ajcox@eastman.com>
Cc: Clark, Emily <eclark@eastman.com>; Bauer, Jeff <Bauer.Jeff@epa.gov>
Subject: RE: [EXTERNAL] RE: P-20-0182

Jim,

I am still waiting on the Final HH assessment. From what I saw in the draft, the PPE will need to be an APF of 1,000 and impervious gloves. The APF is for liver effects from worker inhalation during USE based on the total exposure. (you have the engineering report and can try and address that exposure) in addition to the ones below.

GHS language that I will be looking for in addition to the APF and impervious gloves above is skin sensitization, reproductive toxicity and specific organ toxicity. I know you want to see the HH report to see these endpoints and I will send it as soon as I get it from RAB.

In the mean time you have the exposure report that shows where we need to address ecotoxicity risks where you exceed the chronic coc for more than 20 days and the acute coc for more than 1 day (processing and use).

I don't see any general population risks from fugitive release or from fish or groundwater exposure.

If you have NPDES # for the know sites (processing 1 site, and processing 2 sites) that may also help when we rerun the exposure report if the new information changes the engineering report for water releases.

We can do a consent order for the water trigger of 4 ppb if you don't think you can address the water releases and include the APF if we cannot mitigate that either.

I sent an email to the Team Leader of RMB1 to see if she can bring it up in their next meeting to get it out of Management review in RAB.

I have the day 90 as 1/12/2021.

This is my first day back in a few weeks out of the office and have an email in on 426 as well.

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Program (7405M)
<http://www.epa.gov/oppt/newchems/>

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Washington, DC 20004
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From: Cox, Jim <ajcox@eastman.com>
Sent: Tuesday, January 05, 2021 2:52 PM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Clark, Emily <eclark@eastman.com>
Subject: FW: [EXTERNAL] RE: P-20-0182

Hi Jeff,

We are just looking to determine the status of the review for P-20-0182.

Could you provide an update regarding the status of this PMN?
What is the date of suspension/extension for the review?
Do you have an estimate of when the human health report will be available?

Thank you,

Jim

*A. James Cox
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From: Bauer, Jeff <Bauer.Jeff@epa.gov>
Sent: Thursday, December 3, 2020 1:31 PM
To: Clark, Emily <ecclark@eastman.com>
Cc: Hott, John L <johnhott@eastman.com>; Master, Barbora <Master.Barbora@epa.gov>
Subject: [EXTERNAL] RE: P-20-0182

CAUTION: External Email

Emily,

I am still waiting on the final HH report to share with you. I did send you the engineering report and exposure reports then also. I will be needing a suspension on this PMN. I think you may need some time to address the issues and send information.

Since you have those two reports will have to address the ecotoxicity risks identified in the exposure report unless we are going to do a Consent Order for the water trigger of 4 ppb.

For Worker protection for inhalation it may require an APF of 1,000 in the SDS. If you can pay attention to that exposure that will dictate the respirator requirement.

I was hoping to have that report. I am going to be out for a few weeks and if it get completed I will have someone sanitize it and email it you.

I have included my team leader to this email, as she will assist in getting you the report when it is completed.

Thanks
Jeff

Jeff Bauer - Program Manager
United States Environmental Protection Agency (USEPA)
Office of Pollution Prevention and Toxics (OPPT)
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From: Clark, Emily <eclark@eastman.com>
Sent: Thursday, December 03, 2020 10:24 AM
To: Bauer, Jeff <Bauer.Jeff@epa.gov>
Cc: Hott, John L <johnhott@eastman.com>; Clark, Emily <eclark@eastman.com>
Subject: P-20-0182

Hi Jeff,

We spoke on November 19th and you indicated that the health report was not yet complete for the above indicated PMN but that you were going to check on it. I wanted to circle back with you to see if that is now available or if you have an estimated timeline for that to be released to us? Day 90 of the PMN is in 10 days and we are anxious to understand the results of the Agency's review.

Best regards,

Emily Clark
Product Stewardship and Regulatory Affairs
International Chemical Control Law Regional Team Lead
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